Northern States Power Company

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October 30, 1992

Report required by
10 CFR Part 50, Section 50.73

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Inoperable Fire Barrier Caused by Failure to Perform Surveillance

The voluntary Licensee Event Report for this occurrence is attached. Please contact us if you require further information.

Thomas M Parker
Manager
Nuclear Support Services

c: Regional Administrator - III NRC
Sr Resident Inspector, NRC
NRR Project Manager, NRC
State of Minnesota,
Attn: Kris Sanda

Attachment

030073

IE22

NRC FORM 366 (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

APPROVED OMB NO. 3150-0104

EXPIRES: 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Monticello Nuclear Generating Plant	0 5 0 0 0 2 6 3	1 OF 0 3

TITLE (4)

Inoperable Fire Barrier Caused by Failure to Perform Surveillance

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR		SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
											0 5 0 0 0
0 9	3 0	9 2	9 2	—	0 1 3	— 0 0	1 0	3 0	9 2		0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
N		20.402(b)	20.405(c)	50.73(a)(2)(iii)	73.71(b)
POWER LEVEL (10)		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(iv)	73.71(c)
1 0 0		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(v)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	XX 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
Mike Hippe, Fire Protection System Engineer	6 1 2 — 2 9 5 - 1 3 7 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE)	XX NO			

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On September 30, 1992 it was identified by plant engineering personnel that a fire barrier damper had not been inspected as required by Technical Specifications. The damper was immediately declared inoperable and a fire watch was established. The cause of this event was a failure of personnel to identify the damper as a fire barrier during initial Appendix R reviews. The damper was inspected, tested, and declared operable. The fire watch was terminated, the damper was added to the surveillance procedure, and a review was completed to insure all Appendix R dampers are included in the surveillance procedure.

DESCRIPTION

On September 30, 1992, at 1300 hours, with the plant operating at 100% of rated thermal power, it was identified by plant engineering personnel that a penetration fire barrier damper used to protect safe shutdown equipment had not been inspected as required by Technical Specifications. The fire damper (EIIS Component: DMP) is located at the combined discharge of the Main Control Room (EIIS System: NA) bathroom and kitchen exhaust. The damper which is between the Main Control Room (Fire Area 8, Zone 9) and the Administration Building (EIIS System: MA)(Fire Area 6, Zone 10) was installed in 1980. The damper was immediately declared inoperable, a fire watch was established per Technical Specification 3.13.G.2, and the damper was inspected. At 1400 hours, on September 30, 1992, the damper was declared operable and the fire watch was secured. The surveillance procedure was revised to include the damper.

Technical Specification 4.13.G.1 States, "A visual inspection of penetration fire barriers in fire area boundaries protecting safe shutdown equipment shall be conducted every 18 months". Contrary to the Technical Specification, the damper was not included in the fire penetration barrier surveillance and was not inspected every 18 months. This was a condition prohibited by Technical Specifications and is reportable under 10 CFR 50.73(a)(2)(i).

CAUSE

The cause of this event was a failure to include the damper in the surveillance program. When the damper was installed in 1980 there were no Technical Specification requirements to perform inspections on a periodic basis. In 1984, the Technical Specifications were revised to include Fire Protection. A review was conducted at that time to identify all Appendix R fire barriers. The contract personnel assigned to the project failed to identify the damper as an Appendix R required fire barrier during this review, and subsequent review by plant engineering staff did not identify the error. This was a cognitive error but was not contrary to any approved procedure. There were no known unusual characteristics of the work location which directly contributed to the error.

ANALYSIS

The damper was inspected, tested and determined to be operable and capable of performing its intended function in the event of a fire; therefore, there were no consequences to the health and safety of the public.

CORRECTIVE ACTION

The following actions have been completed:

1. The damper was declared inoperable and a fire watch was immediately established.

2. The damper was inspected, tested to insure it could perform its intended function in the event of a fire, declared operable and the fire watch was terminated.

3. The surveillance procedure was revised to include the damper for inspection every 18 months.

4. Control Room and Emergency Filtration Train ventilation ducting was inspected to verify that all Appendix R dampers are included on the required surveillance procedures. No additional problems were identified during this review.

5. The Modification Process was revised in between the time this work was done and the time the error was discovered. This revision insures plant engineering staff are directly involved in the review of work performed by contract personnel.

ADDITIONAL INFORMATION

Failed Components Identification:

None

Previous Similar Events:

None